

IN THE CIRCUIT COURT OF LAUDERDALE COUNTY
THE STATE OF MISSISSIPPI

JAMEISHA HOLDER

PLAINTIFF

VS.

CIVIL ACTION NO. 14CV177 (B)

GLOBAL EXPERTISE OUTSOURCING,
INCORPORATED, DOING BUSINESS AS
THE GEO CORP, INC., AND
MANAGEMENT TRAINING CORPORATION (MTC)

FILED
2014 DEC 16 PM 3:29
Donna Jill Johnson
CIRCUIT CLERK

ORIGINAL COMPLAINT

COMES NOW Plaintiff, Jameisha Holder, by and through undersigned counsel, and files this Complaint and respectfully shows this Honorable Court the following, to-wit:

PARTIES

- A. Plaintiff, an adult resident citizen of Lauderdale County, Mississippi whose address is 3741 Hwy 45 North, Meridian, Mississippi 39301
- B. Defendant, Global Expertise Outsourcing (*hereinafter referred to as "GEO"*), a foreign corporation that is qualified to transact business in this state, whose corporate headquarters is 621 North West 53rd Street, Suite 700, Boca Raton, Florida 33487, and whose registered agent is Prentice-Hall Corporation System, upon whom process may be served at 506 South President Street M, Jackson, Mississippi 39201 .
- C. Defendant, Management Training Corporation(*hereinafter referred to as "MTC"*) a foreign corporation that is qualified to transact business in this state, whose corporate headquarters is 500 N Marketplace Drive, Centerville, Utah 84014, and is whose



Donna Jill Johnson, Circuit Clerk of Lauderdale County, Mississippi, do hereby certify that the foregoing is a true and correct copy of the original filed in this office.
This is the 22nd day of Jan, 2015.
DONNA JILL JOHNSON, Circuit Clerk
By Donna Dooge D.C.

registered agent is CT Corporation System, upon whom process may be served at 645 Lakeland East Drive, Suite 101, Flowood, MS 39232.

JURISDICTION AND VENUE

1. a) This court has jurisdiction of the subject matter because this is a civil action for tort which arose in Lauderdale County, Mississippi and the claim is within the jurisdictional limits of this court per Section 9-9-21 of the *Mississippi Code Annotated of 1972*, as amended, *hereinafter referred to as "MCA"*.

b) There is jurisdiction over the parties because Defendant is incorporated under the laws of this state and has its principal place of business in Lauderdale County.

FACTUAL ALLEGATIONS

2. In or around March 2014, Plaintiff began employment with Defendant GEO and/or MTC as a correctional officer at its East Mississippi Correctional Facility unit located at 10641 Highway 80 West, Meridian, Mississippi.

3. At all times relevant, Plaintiff worked for Defendant GEO/ and/or MTC at the East Mississippi Correctional Facility, hereinafter referred to as ("the facility") and performed her job duties in a highly professional and competent manner.

4. That on or about April 8, 2014, a scheduled lunch break, Defendants, by and through certain employees, began an ostensibly random search (hereinafter referred to as the "search") of the their employees' vehicle. Plaintiff defaulted on his loan repayment obligation.

5. That Defendants has two (2) K-9 dogs to assist in the aforementioned search.

6. That on the date and time in question, the vehicle that the Plaintiff was in possession

of was searched while on the Defendant's property. It is upon the Plaintiff's information and belief that her vehicle was one of the last to be searched while she was exiting the Defendants' for her lunch break. Plaintiff would show that there was one other vehicle behind her vehicle behind hers.

7. Plaintiff would show that upon her information and belief that K-9 dogs did not give any indications and/or alerts that drugs were located in her vehicle.

8. Plaintiff would show that she would told to get back into her vehicle and that she was Ok'd to leave the campus and go to lunch.

9. Notwithstanding, Plaintiff hear Sergeant Alexander, a employee of the Defendants (hereinafter referred to as "Alexander") tell certain officer to hold the Plaintiff. That which time, Alexander advised the Plaintiff he found a few seeds in the passenger side door of her vehicle. However, Plaintiff thought that she did not him pick anything from her vehicle. **(Note: where was Plaintiff during this search)**

10. At this time, while Plaintiff was on the phone with her mother, she was asked what was going on. Plaintiff advised her mother that she Alexander said he found marijuana sees in her vehicle. At this time, Plaintiff began to get very upset and started crying because she has never been in trouble before and, never smoked marijuana or any other drugs.

11. At this time, certain officer began to tell the Plaintiff to calm down because this was not serious and that she was not going to jail.

12. Subsequently, Plaintiff was escorted back into the facility for interrogation. Plaintiff was interrogated by Alexander and another Sergeant named Rice. The interrogation went from asking questions to harrasment. According to Plaintiffs, these officer kept accusing her of smoking marijuana.

13. In response to the Alexander and Rice's questions, the Plaintiff would consistently answer that she drug not smoke marijuana. Plaintiff went further to offer that she take in drug and lie detector test.

14. To which, Alexander advised the Plaintiff that is she wanted to go home, then she would take full responsibilty for the possession of the marijuna seeds alledgely found in her vehicle.

15. At this time, Plaintiff noticed that the Alexander has been smoking a tobbaoco pipe during the entirety of her interrogation.

16. Plaintiff will show that she advised both officers that she was not taking the blame for violation and/or crime that she did not commit.

17. As a result, the Mississippi Bureaus of Narcotic was called into the interrgration.

18. Plaintiff will show that the agent from the Mississippi Bureau of Narcotics wanted her to write a statement of confession, to which the Plaintiff refused.

19. At this time, Alexander commanded Plaintiff to write the statement so that she could call someone to pick her up and that she would be able to go home.

20. As the Plaintiff believed that she was out of options that this was the only way to leave, she reluctantly acquiesced and wrote a statement, under protest.

21. Plaintiff would that immediately after writing the statement, under protest, the Defendants, by and through theirs employees and agents, tendered the Plaintiff an "Administrative leave without pay" letter. Defendants advised that after a full investigation that she could come back to work and that she was not fired. *A copy of the Administrative letter is attached, marked Exhibit "A" and incorporated by reference verbatim.*

22. Notwithstanding, Alexander and Rice did not allow the Plaintiff to call someone to pick

her up as they promised. Moreover, a Lauderdale County Deputy came, arrested Plaintiff, and transported her to the Lauderdale County Detention Facility.

23. At the jail, Plaintiff was told that she would in custody for a while and that she would not get a bond.

24. Plaintiff will show that she stay an entire night at the Lauderdale County Detention Facility without possibility of a bond until the next day.

25. Plaintiff will show that on April 9, 2014, the following morning, she was wrongfully charged with a felony, namely ***“one count, Possession of a quantity of Marijuana at East Mississippi Correctional Facility”*** allegedly in violation of section 41-29-139 of the Mississippi Code Annotated. This felony charge carries a possible sentence of 3 years to 7 years in the state penitentiary and a fine up to \$25,000.00. ***A copy of the warrant attached, marked Exhibit “B” and incorporated herein by reference verbatim.***

26. Plaintiff will show that she was subjected to public humiliation and embarrassment because her name, likeness, and the alleged felony crime was published in the local newspaper, Jail House Time, and her name and the felony crime was published in the Meridian Star Newspaper.

27. Plaintiff will show that for five (5) months, she was under the stress, embarrassment, and inconvenience of the attending grand jury and arraignment court dates due to this alleged felony charge.

28. Plaintiff will show that on she received a letter from the Lauderdale County Clerk dated September 30, 2014, stating that the Grand Jury returned a NO TRUE BILL for the charge of **possession of marijuana 30 grams or less (B6-081-2014.)** ***A copy of same is attached, marked Exhibit “C” and incorporated herein by reference.***

CLAIM ONE

MALICIOUS PROSECUTION

29. Plaintiff realleges paragraphs (1) through (28) and incorporate them herein.

30. Defendants, through and by their employees, maliciously, and without probable cause therefor, cause the Plaintiff to be arrested under a warrant issued by a justice court judge on the above-mentioned charge.

31. Defendants's criminal charges brought against the Plaintiff were groundless, made without any justification, and the Defendant did prosecute said action against the Plaintiff malicious intent to cause the Plaintiff harm.

32. Therefore, Plaintiff is entitled to damages as a result of the tortious actions of the Defendants.

CLAIM TWO

FALSE IMPRISONMENT

33. Plaintiff alleges paragraphs (1) through (32) and incorporate them herein.

34. Defendants unlawfully held the Plaintiff in custody at their facility and caused the Plaintiff to be arrested by Lauderdale County Sheriff Office and imprisoned as the case may be for one (1) night in the Lauderdale County Correctional Facility against her will.

35. As a result of the Plaintiff being unlawfully and falsely held against her wishes, the Plaintiff was subjected to ridicule and embarrassment and sustained damage to her reputation.

36. Therefore, Plaintiff is entitled to damages as a result of the tortious actions of the Defendants.

CLAIM THREE

DEFAMATION

38. Plaintiff alleges paragraphs (1) through (37) and incorporate them herein.

39. Defendant published the foregoing statements with the intent to convey false and defamatory meanings regarding Plaintiff. That Defendants, by and through its employees intended to convey, and did convey, the false and defamatory meanings.

40. Defendants intentionally and/or negligently conveyed such false and defamatory meanings through each of his specific statements as well as the combination of such statements and the juxtaposition of words, which in the aggregate in each publication, and in the context of all publications, conveyed the foregoing defamatory and false meanings of and concerning following false and defamatory meanings, among others, about the Plaintiff.

41. That each and every statement, meaning, and/or allegation made by the Defendant is false.

42. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

CLAIM FOUR

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

43. Plaintiff alleges paragraphs (1) through (42) and incorporate them herein.

44. Defendant is liable for intentional infliction of emotional distress of the Plaintiff.

45. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

CLAIM FIVE

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

- 46. Plaintiff alleges paragraphs (1) through (45) and incorporate them herein.
- 47. Defendant is liable for negligent infliction of emotional distress of the Plaintiff.
- 48. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

CLAIM SIX

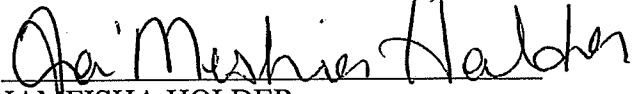
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- 49. Plaintiff alleges paragraphs (1) through (42) and incorporate them herein.
- 50. Defendant is liable for intentional infliction of emotional distress of the Plaintiff.
- 51. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

WHEREFORE, PREMISES, CONSIDERED, Plaintiff requests that the court issue process upon the Defendant Sandra Stephens, and demand judgment against the Defendants, jointly and severally, in the sum of two-fifty thousand dollars(\$250,000.00) as compensatory damages and one million (\$1,000,000.00) as punitive damages, together with attorney's fees, costs of this proceeding, and any and all, special damages proven at a trial.

Further, Plaintiff prays for more such other and further general relief as shall be meet and proper in the premises.

RESPECTFULLY SUBMITTED,


JAMEISHA HOLDER


JOSEPH A. DENSON,
ATTORNEY FOR PLAINTIFF

Submitted to this court by:

Joseph A. Denson, MBN 101910
DENSON AND ASSOCIATES, PLLC
Post Office Box 5022
Meridian, MS 39302-5022
Phone: 601-693-5400
Fax: 601-693-5983

ATTORNEY FOR PLAINTIFF



MANAGEMENT & TRAINING CORPORATION

500 North Marketplace Drive • P.O. Box 10 • Centerville, Utah 84014
801/693-2600 • Fax 801/693-2900

MEMO

To: Jameshia Holder
Copy: Personnel File
From: EMCF HR Manager Derek Davis
Date: 4/8/14
Re: Administrative Leave

Effective 4/8/14, you are being placed on administrative leave **without** pay pending an investigation into a Management & Training Corporation policy violation. During your leave you must provide me with a working telephone number where you can be reached between the hours of 8:00a.m - 5:00p.m.

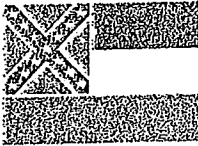
Jameshia Holder
Employee Signature/Date

601-490-3548
Phone Number

Rev. 6/1/12

EXHIBIT "A"

Bond # 5,000.00



WARRANT IN STATE CASE

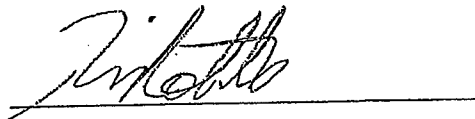
STATE OF MISSISSIPPI

COUNTY OF LAUDERDALE

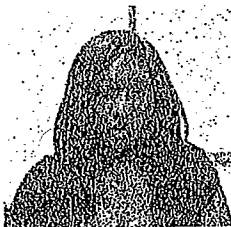
TO THE SHERIFF OF LAUDERDALE COUNTY, MISSISSIPPI:

WE COMMAND YOU to take the body of JA'MESHIA MONTRELLIA HOLDER, SSN 418-39-2787, DOB 2/17/1992, charged with the crime of one count, Possession of a quantity of Marijuana at the East Mississippi Correctional Facility, within said County, which is in violation of the Mississippi Uniform Controlled Substance Act of 1972, Annotated, Section 41-29-139, and the Mississippi Code of 1972, Annotated, Section 47-5-198, and bring her before the undersigned Judge for an examination of said charge.

WITNESS MY HAND, this the 9th day of April, 2014.

A handwritten signature in black ink, appearing to read "J. R. Smith", written over a horizontal line.

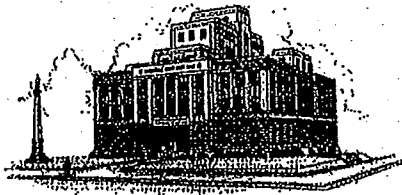
JUSTICE COURT JUDGE



JA'MESHIA MONTRELLIA HOLDER
SSN: 418-39-2787
DOB: 2/17/1992

B6-081-1-2014

EXHIBIT "B"



DONNA JILL JOHNSON

*Clerk of the Circuit, County and Juvenile Courts
of Lauderdale County*

POST OFFICE BOX 1005

MERIDIAN, MISSISSIPPI 39302-1005

CIRCUIT COURT (601) 482-9738 FAX
(601) 484-3970
EMAIL: circuitcourt@lauderdalecounty.org

COUNTY COURT (601) 482-9715 FAX
(601) 486-4940
EMAIL: countycourt@lauderdalecounty.org

YOUTH COURT (601) 482-9830 FAX (601)
481-1960
EMAIL: juvenilecenter@lauderdalecounty.org

CLERK

(601) 482-9731
FAX (601) 482-9734
EMAIL: circuitclerk@lauderdalecounty.org

DATE September 30, 2014

The Lauderdale County JULY 2014 Grand Jury returned
a NO TRUE BILL on Jameshia Holder for the charge of:

Poss of marijuana 30 grams or less (B6-081-2014.)

This case is closed with no further criminal action being pursued.

Donna Jill Johnson,
Circuit Clerk, Lauderdale County

by Renee R. Conner

Deputy Circuit Clerk

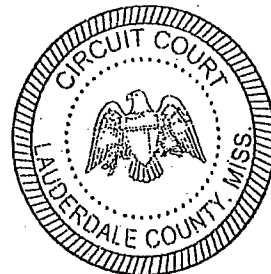


EXHIBIT "C"

IN THE CIRCUIT COURT OF LAUDERDALE COUNTY
THE STATE OF MISSISSIPPI

JAMEISHA HOLDER

PLAINTIFF

VS.

CIVIL ACTION NO. 14CV177CB

GLOBAL EXPERTISE OUTSOURCING,
INCORPORATED, DOING BUSINESS AS
THE GEO CORP, INC., AND
MANAGEMENT TRAINING CORPORATION (MTC)

DEFENDANTS

SUMMONS

TO THE SHERIFF OF LAUDERDALE COUNTY, MISSISSIPPI OR ANY PROCESS SERVER

You are hereby commanded to serve this summons and a copy of the Complaint in this action upon GLOBAL EXPERTISE OUTSOURCING, INCORPORATED DOING BUSINESS AS THE GEO CORP, INC. whose address is _____, by promptly locating the said Defendant and handing to him a copy of this summons and complaint.

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Joseph A. Denson, the attorney for Plaintiff(s), whose address is P. O. Box 5022, 1004 Twentieth Avenue, Meridian, Mississippi 39302-5022. Your response must be mailed or delivered within (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 16 day of Dec, 2014.



Donna Jill Johnson
Lauderdale County Circuit Clerk
Meridian, Mississippi

By:

Renee R. Conner
DEPUTY CLERK

Prepared by:
JOSEPH A. DENSON, MBN 101910
DENSON AND ASSOCIATES, PLLC
1004 TWENTIETH AVENUE
POST OFFICE BOX 5022
MERIDIAN, MS 39302-5022
PHONE: 601-693-5400
FAX: 601-693-5983

IN THE CIRCUIT COURT OF LAUDERDALE COUNTY
THE STATE OF MISSISSIPPI

JAMEISHA HOLDER

PLAINTIFF

VS.

CIVIL ACTION NO. 14CN171(B)

GLOBAL EXPERTISE OUTSOURCING,
INCORPORATED, DOING BUSINESS AS
THE GEO CORP, INC., AND
MANAGEMENT TRAINING CORPORATION (MTC)

DEFENDANTS

SUMMONS

TO THE SHERIFF OF LAUDERDALE COUNTY, MISSISSIPPI OR ANY PROCESS SERVER

You are hereby commanded to serve this summons and a copy of the Complaint in this action upon MANAGEMENT TRAINING CORPORATION (MTC) whose address is _____, by promptly locating the said Defendant and handing to him a copy of this summons and complaint.

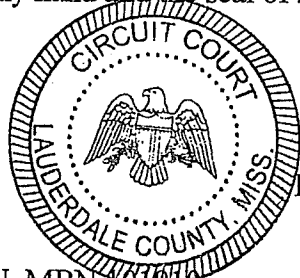
NOTICE TO DEFENDANT

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT
AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to Joseph A. Denson, the attorney for Plaintiff(s), whose address is P. O. Box 5022, 1004 Twentieth Avenue, Meridian, Mississippi 39302-5022. Your response must be mailed or delivered within (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this the 16 day of Dec, 2014.



By:

Donna Jill Johnson
Lauderdale County Circuit Clerk
Meridian, Mississippi

Renee R. Couert
DEPUTY CLERK

Prepared by:
JOSEPH A. DENSON, MBN 161916
DENSON AND ASSOCIATES, PLLC
1004 TWENTIETH AVENUE
POST OFFICE BOX 5022
MERIDIAN, MS 39302-5022
PHONE: 601-693-5400
FAX: 601-693-5983

IN THE CIRCUIT COURT OF LAUDERDALE COUNTY
STATE OF MISSISSIPPI

JAMEISHA HOLDER

PLAINTIFF

V.

CIVIL ACTION NUMBER: 14-CV-177(B)

GLOBAL EXPERTISE OUTSOURCING
INCORPORATED, DOING BUSINESS
AS THE GEO CORP, INC., AND
MANAGEMENT TRAINING CORPORATION (MTC)

DEFENDANT

AGREED JUDGMENT OF DISMISSAL WITHOUT PREJUDICE

THIS CAUSE comes before the Court on the request ore tenus of the Plaintiff, that the action be dismissed without prejudice as to The GEO Group, Inc. (named in this case as "Global Expertise Outsourcing Incorporated, doing business as The GEO Corp, Inc.) only. The Court finds the Motion should be granted. It is therefore,

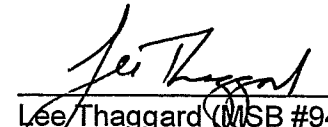
ORDERED AND ADJUDGED that Plaintiff's claims against Defendant The GEO Group, Inc., (named in this case as "Global Expertise Outsourcing Incorporated, doing business as The GEO Corp, Inc.") be, and are hereby, dismissed without prejudice. Each party shall bear her/its own costs (including attorney's fees).

SO ORDERED AND ADJUDGED, this the 13th day of January, 2015.


CIRCUIT COURT JUDGE

AGREED:


Joseph Denson (MSB #101910)
Attorney for Plaintiff, Jameisha Holder


Lee Thaggard (MSB #9442)
Attorney for Defendant,
The GEO Group, Inc. (named in this case as
"Global Expertise Outsourcing Incorporated,
doing business as The GEO Corp, Inc.")

FILED
2015 JAN 13 AM 10:35
Dorcas J. Johnson
CIRCUIT CLERK

IN THE CIRCUIT COURT OF LAUDERDALE COUNTY, MISSISSIPPI

JAMEISHA HOLDER

PLAINTIFF

VS.

CIVIL ACTION NO. 14-CV-177(B)

GLOBAL EXPERTISE OUTSOURCING
INCORPORATED, DOING BUSINESS
AS THE GEO CORP, INC., AND
MANAGEMENT & TRAINING CORPORATION (MTC)

DEFENDANTS

NOTICE OF REMOVAL TO THE UNITED STATES DISTRICT COURT

PLEASE BE ADVISED that Defendant Management & Training Corporation, by counsel and pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, removed this matter to the United States District Court for the Southern District of Mississippi, Northern Division, on January 20, 2015. A copy of the Notice of Removal filed with the Clerk of the United States District Court for the Southern District of Mississippi, Northern Division is attached as Exhibit "1." Accordingly, this matter has been removed from the jurisdiction of the Circuit Court of Lauderdale County, Mississippi.

RESPECTFULLY SUBMITTED, this the 20th day of January, 2015.

MANAGEMENT & TRAINING CORPORATION

BY: R. Jarrad Garner

R. Jarrad Garner (MSB #99584)
Benjamin B. Morgan (MSB #103663)
Adams and Reese LLP
1018 Highland Colony Parkway, Suite 800
Ridgeland, Mississippi 39157
Telephone: (601) 353-3234
Facsimile: (601) 355-9708
jarrad.garner@arlaw.com
ben.morgan@arlaw.com

FILED

JAN 21 2015

Donna Yule Johnson
CIRCUIT CLERK

CERTIFICATE OF SERVICE

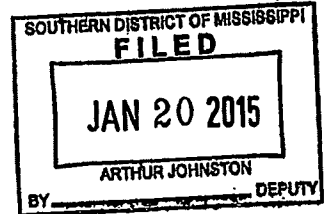
I, R. Jarrad Garner, counsel for Defendant Management & Training Corporation, do hereby certify that I have this date mailed, postage prepaid, and/or hand delivered a copy of the foregoing to:

Joseph A. Denson, Esq.
Denson and Associates, PLLC
Post Office Box 5022
Meridian, Mississippi 39302-5022

THIS the 20th day of January, 2015.



R. Jarrad Garner



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

JAMEISHA HOLDER

PLAINTIFF

VS.

CIVIL ACTION NO. 3:15cv44 DPJ-FKB

GLOBAL EXPERTISE OUTSOURCING
INCORPORATED, DOING BUSINESS
AS THE GEO CORP, INC., AND
MANAGEMENT & TRAINING CORPORATION (MTC)

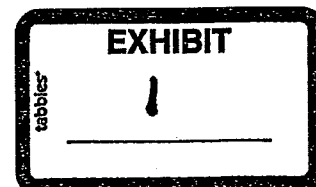
DEFENDANTS

NOTICE OF REMOVAL

COMES NOW Defendant Management & Training Corporation ("MTC"), by counsel and pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, and removes this cause to this Court and would show as follows:

1. On or about December 16, 2014, Plaintiff Jameisha Holder filed her Complaint styled as *Jameisha Holder vs. Global Expertise Outsourcing Incorporated, Doing Business As The Geo Corp., Inc., and Management & Training Corporation*, Civil Action No. 14-CV-177(B), in the Circuit Court of Lauderdale County, Mississippi.

2. MTC was served with a copy of a Summons and the Complaint on or about December 26, 2014. Upon information and belief, Defendant Global Expertise Outsourcing Incorporated, Doing Business As The Geo Corp, Inc. ("The Geo Group, Inc.") was served with a copy of a Summons and the Complaint on or about December 29, 2014. However, The Geo Group, Inc. was dismissed from the underlying state court litigation without prejudice on January 13, 2015. See Exhibit "A," Agreed Judgment of Dismissal. Consequently, The Geo Group, Inc.'s joinder in this Notice of Removal is unnecessary. Therefore, this Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446.



3. Diversity jurisdiction is appropriate when the parties are diverse and the amount in controversy is met. 28 U.S.C. §§ 1332. Here, both the diversity requirement and the amount in controversy requirement are met on the face of Plaintiff's Complaint.

4. Regarding diversity, Plaintiff admits that she is a resident citizen of Lauderdale County, Mississippi. *See* Exhibit "B," Complaint, ¶ A. Plaintiff also admits that MTC is a foreign corporation with its principle place of business located in the State of Utah. *Id.*, at ¶ C. Therefore, the diversity requirement is met.

5. Regarding the amount in controversy, it is facially apparent from Plaintiff's Complaint that the amount in controversy exceeds \$75,000.00, exclusive of interests and costs. Specifically, Plaintiff explicitly "demand[s] judgment against the Defendants, jointly and severally, in the sum of two-fifty thousand dollars (\$250,000.00) as compensatory damages and one million (\$1,000,000.00) as punitive damages" in the *ad damnum* paragraph of her Complaint. *Id.*, p. 8.

6. For the foregoing reasons, the above-described action is a civil action in which this Court has jurisdiction under the provisions of 28 U.S.C. § 1332, since this action is a controversy wholly between citizens of different states, and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

7. MTC has been unable to practicably obtain a copy of the entire state court record as of this date. Accordingly, and as required by L.U.Civ.R. 5(b), a certified copy of the entire state court record will be filed within fourteen (14) days from the date of removal.

8. MTC, after promptly filing this Notice of Removal, will give notice to all parties and to the Circuit Clerk of Lauderdale County, Mississippi, by filing a copy of this Notice of Removal with the Circuit Clerk of Lauderdale County, Mississippi.

9. MTC further reserves its right to amend and/or supplement this Notice of Removal as needed and as appropriate.

WHEREFORE, PREMISES CONSIDERED, Defendant Management & Training Corporation respectfully requests that this Court assume jurisdiction as required by law.

RESPECTFULLY SUBMITTED, this the 20th day of January, 2015.

MANAGEMENT & TRAINING CORPORATION

BY: R. J. Garner
R. Jarrad Garner (MSB #99584)
Benjamin B. Morgan (MSB #103663)
Adams and Reese LLP
1018 Highland Colony Parkway, Suite 800
Ridgeland, Mississippi 39157
Telephone: (601) 353-3234
Facsimile: (601) 355-9708
jarrad.garner@arlaw.com
ben.morgan@arlaw.com

CERTIFICATE OF SERVICE

I, R. Jarrad Garner, counsel for Defendant Management & Training Corporation, do hereby certify that I have this date mailed, postage prepaid, and/or hand delivered a copy of the foregoing to:

Joseph A. Denson, Esq.
Denson and Associates, PLLC
Post Office Box 5022
Meridian, Mississippi 39302-5022

THIS the 20th day of January, 2015.

R. J. Garner
R. Jarrad Garner

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Jamelsna Holder

DEFENDANTS

Global Expertise Outsourcing Incorporated, doing business as the GEO Corp., Inc., and Management and Training Corporation (MTC)

(b) County of Residence of First Listed Plaintiff Lauderdale
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Utah
(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Joseph A. Denson, Esq., Denson & Assoc., PLLC, P.O. Box 5022,
Meridian, MS 39302; 601-693-5400

R. Jarrod Garner, Benjamin B. Morgan, Adams and Reese LLP, 1018
Highland Colony Pkwy, Suite 800, Ridgeland, MS 39157;
601-353-3234

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	PERSONAL INJURY	PERSONAL INJURY	PROPERTY	LABOR	OTHER
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input checked="" type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. 1332 & 1441

Brief description of cause:

Wrongful termination, false imprisonment & malicious prosecution

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE n/a

DOCKET NUMBER n/a

DATE

01/15/2015

SIGNATURE OF ATTORNEY OF RECORD

R. J. Denson (P.O. No. 99541)

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

#34643031242

IN THE CIRCUIT COURT OF LAUDERDALE COUNTY
STATE OF MISSISSIPPI

JAMEISHA HOLDER

PLAINTIFF

V.

CIVIL ACTION NUMBER: 14-CV-177(B)

GLOBAL EXPERTISE OUTSOURCING
INCORPORATED, DOING BUSINESS
AS THE GEO CORP, INC., AND
MANAGEMENT TRAINING CORPORATION (MTC)

DEFENDANT

AGREED JUDGMENT OF DISMISSAL WITHOUT PREJUDICE

THIS CAUSE comes before the Court on the request ore tenus of the Plaintiff, that the action be dismissed without prejudice as to The GEO Group, Inc. (named in this case as "Global Expertise Outsourcing Incorporated, doing business as The GEO Corp, Inc.) only. The Court finds the Motion should be granted. It is therefore,

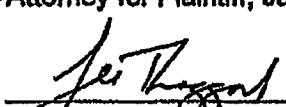
ORDERED AND ADJUDGED that Plaintiff's claims against Defendant The GEO Group, Inc., (named in this case as "Global Expertise Outsourcing Incorporated, doing business as The GEO Corp, Inc.") be, and are hereby, dismissed without prejudice. Each party shall bear her/its own costs (including attorney's fees).

SO ORDERED AND ADJUDGED, this the 13th day of January, 2015.

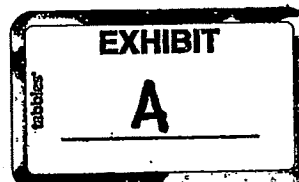

CIRCUIT COURT JUDGE

AGREED:


Joseph Denson (MSB #101910)
Attorney for Plaintiff, Jameisha Holder


Lee Thaggard (MSB #9442)
Attorney for Defendant,
The GEO Group, Inc. (named in this case as
"Global Expertise Outsourcing Incorporated,
doing business as The GEO Corp, Inc.")

FILED
2015 JAN 13 AM 10:35
Donna Jean Johnson
CIRCUIT CLERK



IN THE CIRCUIT COURT OF LAUDERDALE COUNTY
THE STATE OF MISSISSIPPI

JAMEISHA HOLDER

COPY

PLAINTIFF

VS.

CIVIL ACTION NO. 14CV177 (B)

GLOBAL EXPERTISE OUTSOURCING,
INCORPORATED, DOING BUSINESS AS
THE GEO CORP, INC., AND
MANAGEMENT TRAINING CORPORATION (MTC)

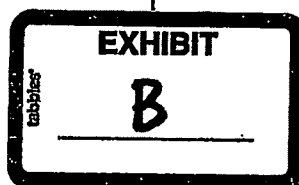
FILED
2014 DEC 16 PM 3:29
Circuit Clerk
Doris C. Johnson

ORIGINAL COMPLAINT

COMES NOW Plaintiff, Jameisha Holder, by and through undersigned counsel, and files
this Complaint and respectfully shows this Honorable Court the following, to-wit:

PARTIES

- A. Plaintiff, an adult resident citizen of Lauderdale County, Mississippi whose address is
3741 Hwy 45 North, Meridian, Mississippi 39301
- B. Defendant, Global Expertise Outsourcing (*hereinafter referred to as "GEO"*), a
foreign corporation that is qualified to transact business in this state, whose corporate
headquarters is 621 NorthWest 53rd Street, Suite 700, Boca Raton, Florida 33487, and
whose registered agent is Prentice-Hall Corporation System, upon whom process may
be served at 506 South President Street M, Jackson, Mississippi 39201 .
- C. Defendant, Management Training Corporation (*hereinafter referred to as "MTC"*) a
foreign corporation that is qualified to transact business in this state, whose corporate
headquarters is 500 N Marketplace Drive, Centerville, Utah 84014, and whose



registered agent is CT Corporation System, upon whom process may be served at 645 Lakeland East Drive, Suite 101, Flowood, MS 39232.

JURISDICTION AND VENUE

1. a) This court has jurisdiction of the subject matter because this is a civil action for tort which arose in Lauderdale County, Mississippi and the claim is within the jurisdictional limits of this court per Section 9-9-21 of the *Mississippi Code Annotated of 1972*, as amended, *hereinafter referred to as "MCA"*.

b) There is jurisdiction over the parties because Defendant is incorporated under the laws of this state and has its principal place of business in Lauderdale County.

FACTUAL ALLEGATIONS

2. In or around March 2014, Plaintiff began employment with Defendant GEO and/or MTC as a correctional officer at its East Mississippi Correctional Facility unit located at 10641 Highway 80 West, Meridian, Mississippi.

3. At all times relevant, Plaintiff worked for Defendant GEO/ and/or MTC at the East Mississippi Correctional Facility, hereinafter referred to as ("the facility") and performed her job duties in a highly professional and competent manner.

4. That on or about April 8, 2014, a scheduled lunch break, Defendants, by and through certain employees, began an ostensibly random search (hereinafter referred to as the "search") of the their employees' vehicle. Plaintiff defaulted on his loan repayment obligation.

5. That Defendants has two (2) K-9 dogs to assist in the aforementioned search.

6. That on the date and time in question, the vehicle that the Plaintiff was in possession

of was searched while on the Defendant's property. It is upon the Plaintiff's information and belief that her vehicle was one of the last to be searched while she was exiting the Defendants' for her lunch break. Plaintiff would show that there was one other vehicle behind her vehicle behind hers.

7. Plaintiff would show that upon her information and belief that K-9 dogs did not give any indications and/or alerts that drugs were located in her vehicle.

8. Plaintiff would show that she would told to get back into her vehicle and that she was Ok'd to leave the campus and go to lunch.

9. Notwithstanding, Plaintiff hear Sergeant Alexander, a employee of the Defendants (hereinafter referred to as "Alexander") tell certain officer to hold the Plaintiff. That which time, Alexander advised the Plaintiff he found a few seeds in the passenger side door of her vehicle. However, Plaintiff thought that she did not him pick anything from her vehicle. (Note: where was Plaintiff during this search)

10. At this time, while Plaintiff was on the phone with her mother, she was asked what was going on. Plaintiff advised her mother that she Alexander said he found marijuana sees in her vehicle. At this time, Plaintiff began to get very upset and started crying because she has never been in trouble before and, never smoked marijuana or any other drugs.

11. At this time, certain officer began to tell the Plaintiff to calm down because this was not serious and that she was not going to jail.

12. Subsequently, Plaintiff was escorted back into the facility for interrogation. Plaintiff was interrogated by Alexander and another Sergeant named Rice. The interrogation went from asking questions to harrasment. According to Plaintiffs, these officer kept accusing her of smoking marijuana.

13. In response to the Alexander and Rice's questions, the Plaintiff would consistently answer that she drug not smoke marijuana. Plaintiff went further to offer that she take in drug and lie detector test.

14. To which, Alexander advised the Plaintiff that is she wanted to go home, then she would take full responsibility for the possession of the marijuana seeds allegedly found in her vehicle.

15. At this time, Plaintiff noticed that the Alexander has been smoking a tobacco pipe during the entirety of her interrogation.

16. Plaintiff will show that she advised both officers that she was not taking the blame for violation and/or crime that she did not commit.

17. As a result, the Mississippi Bureaus of Narcotic was called into the interrgation.

18. Plaintiff will show that the agent from the Mississippi Bureau of Narcotics wanted her to write a statement of confession, to which the Plaintiff refused.

19. At this time, Alexander commanded Plaintiff to write the statement so that she could call someone to pick her up and that she would be able to go home.

20. As the Plaintiff believed that she was out of options that this was the only way to leave, she reluctantly acquiesced and wrote a statement, under protest.

21. Plaintiff would that immediately after writing the statement, under protest, the Defendants, by and through their employees and agents, tendered the Plaintiff an "Administrative leave without pay" letter. Defendants advised that after a full investigation that she could come back to work and that she was not fired. *A copy of the Administrative letter is attached, marked Exhibit "A" and incorporated by reference verbatim.*

22. Notwithstanding, Alexander and Rice did not allow the Plaintiff to call someone to pick

her up as they promised. Moreover, a Lauderdale County Deputy came, arrested Plaintiff, and transported her to the Lauderdale County Detention Facility.

23. At the jail, Plaintiff was told that she would in custody for a while and that she would not get a bond.

24. Plaintiff will show that she stay an entire night at the Lauderdale County Detention Facility without possibility of a bond until the next day.

25. Plaintiff will show that on April 9, 2014, the following morning, she was wrongfully charged with a felony, namely *"one count, Possession of a quantity of Marijuana at East Mississippi Correctional Facility"* allegedly in violation of section 41-29-139 of the Mississippi Code Annotated. This felony charge carries a possible sentence of 3 years to 7 years in the state penitentiary and a fine up to \$25,000.00. *A copy of the warrant attached, marked Exhibit "B" and incorporated herein by reference verbatim.*

26. Plaintiff will show that she was subjected to public humiliation and embarrassment because her name, likeness, and the alleged felony crime was published in the local newspaper, Jail House Time, and her name and the felony crime was published in the Meridian Star Newspaper.

27. Plaintiff will show that for five (5) months, she was under the stress, embarrassment, and inconvenience of the attending grand jury and arraignment court dates due to this alleged felony charge.

28. Plaintiff will show that on she received a letter from the Lauderdale County Clerk dated September 30, 2014, stating that the Grand Jury returned a NO TRUE BILL for the charge of possession of marijuana 30 grams or less (B6-081-2014.) *A copy of same is attached, marked Exhibit "C" and incorporated herein by reference.*

CLAIM ONE

MALICIOUS PROSECUTION

29. Plaintiff realleges paragraphs (1) through (28) and incorporate them herein.

30. Defendants, through and by their employees, maliciously, and without probable cause therefor, cause the Plaintiff to be arrested under a warrant issued by a justice court judge on the above-mentioned charge.

31. Defendants's criminal charges brought against the Plaintiff were groundless, made without any justification, and the Defendant did prosecute said action against the Plaintiff malicious intent to cause the Plaintiff harm.

32. Therefore, Plaintiff is entitled to damages as a result of the tortious actions of the Defendants.

CLAIM TWO

FALSE IMPRISONMENT

33. Plaintiff alleges paragraphs (1) through (32) and incorporate them herein.

34. Defendants unlawfully held the Plaintiff in custody at their facility and caused the Plaintiff to be arrested by Lauderdale County Sheriff Office and imprisoned as the case may be for one (1) night in the Lauderdale County Correctional Facility against her will.

35. As a result of the Plaintiff being unlawfully and falsely held against her wishes, the Plaintiff was subjected to ridicule and embarrassment and sustained damage to her reputation.

36. Therefore, Plaintiff is entitled to damages as a result of the tortious actions of the Defendants.

CLAIM THREE

DEFAMATION

38. Plaintiff alleges paragraphs (1) through (37) and incorporate them herein.

39. Defendant published the foregoing statements with the intent to convey false and defamatory meanings regarding Plaintiff. That Defendants, by and through its employees intended to convey, and did convey, the false and defamatory meanings.

40. Defendants intentionally and/or negligently conveyed such false and defamatory meanings through each of his specific statements as well as the combination of such statements and the juxtaposition of words, which in the aggregate in each publication, and in the context of all publications, conveyed the foregoing defamatory and false meanings of and concerning following false and defamatory meanings, among others, about the Plaintiff.

41. That each and every statement, meaning, and/or allegation made by the Defendant is false.

42. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

CLAIM FOUR

INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

43. Plaintiff alleges paragraphs (1) through (42) and incorporate them herein.

44. Defendant is liable for intentional infliction of emotional distress of the Plaintiff.

45. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

CLAIM FIVE

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

- 46. Plaintiff alleges paragraphs (1) through (45) and incorporate them herein.
- 47. Defendant is liable for negligent infliction of emotional distress of the Plaintiff.
- 48. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

CLAIM SIX

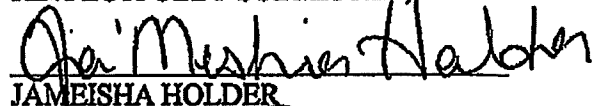
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

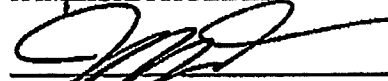
- 49. Plaintiff alleges paragraphs (1) through (42) and incorporate them herein.
- 50. Defendant is liable for intentional infliction of emotional distress of the Plaintiff.
- 51. As of a result, Plaintiff is entitled to compensatory, general, and punitive damages.

WHEREFORE, PREMISES, CONSIDERED, Plaintiff requests that the court issue process upon the Defendant Sandra Stephens, and demand judgment against the Defendants, jointly and severally, in the sum of two-fifty thousand dollars(\$250,000.00) as compensatory damages and one million (\$1,000,000.00) as punitive damages, together with attorney's fees, costs of this proceeding, and any and all, special damages proven at a trial.

Further, Plaintiff prays for more such other and further general relief as shall be meet and proper in the premises.

RESPECTFULLY SUBMITTED,


JAMEISHA HOLDER


JOSEPH A. DENSON,
ATTORNEY FOR PLAINTIFF

Submitted to this court by:

Joseph A. Denson, MBN 101910
DENSON AND ASSOCIATES, PLLC
Post Office Box 5022
Meridian, MS 39302-5022
Phone: 601-693-5400
Fax: 601-693-5983

ATTORNEY FOR PLAINTIFF



MANAGEMENT & TRAINING CORPORATION

500 North Marketplace Drive • P.O. Box 10 • Centerville, Utah 84014
801/893-2600 • Fax 801/893-2900

MEMO

To: Jameshia Holder
Copy: Personnel File
From: EMCF HR Manager Derek Davis
Date: 4/8/14
Re: Administrative Leave

Effective 4/8/14, you are being placed on administrative leave without pay pending an investigation into a Management & Training Corporation policy violation. During your leave you must provide me with a working telephone number where you can be reached between the hours of 8:00a.m - 5:00p.m.

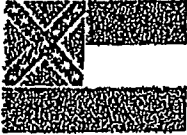
Jameshia Holder
Employee Signature/Date

601-440-3548
Phone Number

Rev. 6/1/12

EXHIBIT "A"

Bond # 5,000.00



WARRANT IN STATE CASE

STATE OF MISSISSIPPI

COUNTY OF LAUDERDALE

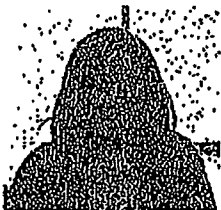
TO THE SHERIFF OF LAUDERDALE COUNTY, MISSISSIPPI:

WE COMMAND YOU to take the body of JA'MESHIA MONTRELLIA HOLDER, SSN 418-39-2787, DOB 2/17/1992, charged with the crime of one count, Possession of a quantity of Marijuana at the East Mississippi Correctional Facility, within said County, which is in violation of the Mississippi Uniform Controlled Substance Act of 1972, Annotated, Section 41-29-139, and the Mississippi Code of 1972, Annotated, Section 47-5-198, and bring her before the undersigned Judge for an examination of said charge.

WITNESS MY HAND, this the 9th day of April, 2014.

A handwritten signature in cursive script, likely belonging to the Justice Court Judge.

JUSTICE COURT JUDGE



JA'MESHIA MONTRELLIA HOLDER
SSN: 418-39-2787
DOB: 2/17/1992

B6-081-1-2014

EXHIBIT "B"



DONNA JILL JOHNSON

*Clerk of the Circuit, County and Juvenile Courts
of Lauderdale County*

POST OFFICE BOX 1005

MERIDIAN, MISSISSIPPI 39302-1005

CIRCUIT COURT (601) 482-8738 FAX
(601) 484-3970
EMAIL circuitcourt@lauderdalecounty.org

COUNTY COURT (601) 482-8715 FAX
(601) 488-4940
EMAIL countycourt@lauderdalecounty.org

YOUTH COURT (601) 482-8830 FAX (601)
481-1860
EMAIL juvenilecenter@lauderdalecounty.org

CLERK
(601) 482-8731
FAX (601) 482-8734
EMAIL circuitclerk@lauderdalecounty.org

DATE September 30, 2014

The Lauderdale County JULY 2014 Grand Jury returned
a NO TRUE BILL on Jameshia Holder for the charge of:

Poss of marijuana 30 grams or less (B6-081-2014.)

This case is closed with no further criminal action being pursued.

Donna Jill Johnson,
Circuit Clerk, Lauderdale County

by Renee R. Conner

Deputy Circuit Clerk

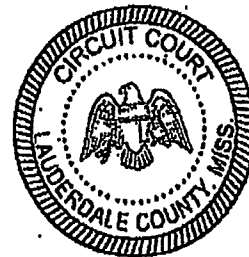


EXHIBIT "C"